## **Permit to Operate**

FACILITY: S-883 EXPIRATION DATE: 01/31/200

**LEGAL OWNER OR OPERATOR**: RIO BRAVO POSO **MAILING ADDRESS**: P O BOX 81027

BAKERSFIELD, CA 93380-1027

FACILITY LOCATION: HEAVY OIL CENTRAL

, CA

**FACILITY DESCRIPTION:** ELECTRIC SERVICES

The Facility to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

The Permit to Opertae remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

DAVID L. CROW

Executive Director / APCO

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**Diector of Permit Services** 

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-0-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Kern County Rule 111; and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Kern County Rule 111; and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0], [Federally Enforceable Through Title V]
- 4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020. [District Rule 2010, 3.0 and 4.0; 2020; and Kern County Rule 201], [Federally Enforceable Through Title V]
- 5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1], [Federally Enforceable Through Title V]
- 6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 7. Every application for a permit required under Rule 2010 (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040], [Federally Enforceable Through Title V]
- 8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.5.1], [Federally Enforceable Through Title V]
- 9. The operator shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.5.2], [Federally Enforceable Through Title V]
- 10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.6.1], [Federally Enforceable Through Title V]
- 11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520. [District Rules 2520, 9.6.2 and 1100, 7.0], [Federally Enforceable Through Title V]
- 12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.8 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]

- 13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.9.2], [Federally Enforceable Through Title V]
- 14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.9.3], [Federally Enforceable Through Title V]
- 15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4], [Federally Enforceable Through Title V]
- 16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.9.5], [Federally Enforceable Through Title V]
- 17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.10], [Federally Enforceable Through Title V]
- 18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District, the ARB, or EPA to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.14.2.1 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District, the ARB, or EPA to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.14.2.2 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District, the ARB, or EPA to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.14.2.3 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District, the ARB, or EPA to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.14.2.4 and PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101, by using EPA method 9. If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and Kern County Rule 401], [Federally Enforceable Through Title V]
- 23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1], [Federally Enforceable Through Title V]
- 24. No person shall apply, sell, solicit, or offer for sale any specialty architectural coating listed in the Table of Standards (District Rule 4601, Table 1), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs (less water and exempt compounds, excluding any colorant added to tint bases) in excess of the specified limits listed in Table 1 of Rule 4601. [District Rule 4601, 5.2], [Federally Enforceable Through Title V]
- 25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4], [Federally Enforceable Through Title V]
- 26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5], [Federally Enforceable Through Title V]
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2. [District Rule 4601, 6.1 and 6.2], [Federally Enforceable Through Title V]
- 28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.14.1 and 10.0], [Federally Enforceable Through Title V]
- 29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F], [Federally Enforceable Through Title V]
- 30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, [40 CFR Part 82, Subpart B], [Federally Enforceable Through Title V]

- 31. Disturbances of soil related to any construction, demolition, excavation, extraction, or water mining activities shall comply with the requirements for fugitive dust control in SJVUAPCD District Rule 8020 unless specifically exempted under section 4 of Rule 8020. [District Rule 8020], [Federally Enforceable Through Title V]
- 32. Outdoor handling and storage of any bulk material which emits dust shall comply with the requirements of SJVUAPCD Rule 8030, unless specifically exempted under section 4 of Rule 8030. [District Rule 8030], [Federally Enforceable Through Title V]
- 33. Any paved road over 3 miles in length, and any unpaved roads over half a mile in length, constructed after December 10, 1993 shall use the design criteria and dust control measures of, and comply with the administrative requirements of, SJVUAPCD Rule 8060 unless specifically exempted under section 4 of Rule 8060. [District Rule 8060], [Federally Enforceable Through Title V]
- 34. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M], [Federally Enforceable Through Title V]
- 35. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.17], [Federally Enforceable Through Title V]
- 36. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2], [Federally Enforceable Through Title V]
- 37. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1], [Federally Enforceable Through Title V]
- 38. Equipment covered by this permit shall at all times be maintained in good working order and be operated as efficiently as possible so to minimize air pollutant emissions. [PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 39. In the event of changes in control or ownership, this Operating Permit shall be binding on new owners and operators. The applicant shall notify successor of the existence of this Operating Permit and its conditions in writing and forward a copy to the District, California Air Resources Board, and EPA. [PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 40. The applicant shall construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and District air quality regulations. [PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 41. Should additional guidance related to the June 3, 1986 PSD remand be developed, Rio Bravo shall provide to EPA any such analysis, data or demonstration of compliance with other requirements within the time required by such guidance. [PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 42. All correspondence as required by this Operating Permit shall be forwarded to: the District; Director, Air & Toxics Div. (Attn: A-3-3), EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105; and Director, Stationary Source Div., CARB, Box 2815, Sacramento, CA 95812. [PSD ATC SJ 85-06], [Federally Enforceable Through Title V]
- 43. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 44. All permits issued to Rio Bravo Poso (S-883) and Rio Bravo Jasmin (S- 1751) are included in the same heavy oil central stationary source. [District NSR Rule], [Federally Enforceable Through Title V]
- When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68], [Federally Enforceable Through Title V]
- 46. On April 28, 2000, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of the reporting period. [District Rule 2520], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-1-5 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

FUEL RECEIVING AND STORAGE OPERATION INCLUDING ENCLOSED TRUCK RECEIVING STATION WITH FABRIC COLLECTOR AND WATER/SURFACTANT SPRAY SYSTEM, TWO FUEL SILOS WITH FABRIC COLLECTORS, AND ENCLOSED UNDERHOPPER CONVEYOR - POSO CREEK

- 1. Two 30 ft. dia. by 80 ft. tall fuel storage silos shall each vent to a fabric collector. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. Operation shall include equipment to receive and transfer TDF, including: three enclosed discharge feeders and conveyors, belt scale, bucket elevator and transfer chutes, all enclosed or covered. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Coal/petroleum coke truck receiving shall be fully enclosed during entire fuel unloading operation. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity at any time from truck receiving hopper enclosure, fuel conveyors, conveyor transfer points, fuel storage silos or any fabric collector. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Coal/coke shall not be received, conveyed, or transferred into storage silos unless ventilation systems and fabric collectors are operating. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. All collected fines shall be returned to the fuel system. [District NSR Rule], [Federally Enforceable Through Title V]
- 7. Coal/coke receiving shall not operate more than 300 hours per month. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. PM10 emissions rate from both fuel silo fabric collectors shall not exceed 0.032 lb/hr. [District NSR Rule], [Federally Enforceable Through Title V]
- All roadways, driveways, and vehicular work areas shall be surfaced with slow cure asphalt paving. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. Fabric collection system shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 11. Fabric collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might intertfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 12. Visible emissions from storage silo shall be checked and record results quarterly. If visible emissions are observed, corrective action is required prior to further loading. Corrective action means that visible emissions are eliminated before next loading event. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 13. Records of fabric collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. The records of hours of operation of fuel receiving system shall be maintained on monthly basis. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-2-4 **EXPIRATION DATE:** 01/31/2005

### **EQUIPMENT DECRIPTION:**

LIMESTONE RECEIVING AND STORAGE OPERATION INCLUDING ONE PNEUMATICALLY FILLED STORAGE SILO WITH FABRIC COLLECTOR - POSO CREEK

- 1. Limestone shall not be transferred into silo unless fabric collectors are operating. [District NSR Rule], [Federally Enforceable Through Title V]
- Collected fines shall be returned to limestone system. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Limestone receiving shall not exceed 96 hours per month on a monthly average without prior District approval. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Silo fabric collector particulate matter (PM-10) emission rate shall not exceed 0.141 lb/hr and 0.02 gr/scf. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Fabric collection system shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 6. Fabric collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might intertfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 7. Visible emissions from storage silo shall be checked and record results annually. If visible emissions are observed, corrective action is required prior to further loading. Corrective action means that visible emissions are eliminated before next loading event. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 8. Records of fabric collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of indiviual performing inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 9. The records of hours of operation of limestone receiving system shall be maintained on monthly basis. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-3-5 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

36.0 MW SOLID FUEL FIRED CIRCULATING BED COMBUSTOR COGENERATION UNIT INCLUDING 389.1 MMBTU/HR COMBUSTOR WITH LOW-TEMPERATURE STAGED COMBUSTION, AMMONIA INJECTION, AND PULVERIZED LIMESTONE INJECTION - POSO CREEK

- 1. Permittee shall comply in full with all applicable Rule 4001 requirements (New Source Performance Standards, 40 CFR, Part 60, Subpart Da). [District Rule 4001], [Federally Enforceable Through Title V]
- Fuel collecting conveyor, two fuel crushers, two bucket elevators, two boiler feed conveyors, fuel feed bin, fuel feeder, and limestone
  conveyor/feeder shall be totally enclosed and ventilated to fabric collector. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Operation shall be equipped with pneumatic limestone feed system. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Operation shall be equipped with primary and secondary combustion air blowers and air preheater with ash hopper. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Operation shall be equipped with fabric collector with ash hopper serving fuel/limestone handling equipment and combustor. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. The main exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples using approved EPA test methods. [District Rule 1081, 3.0; Kern County Rule 108.1; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 7. Combustor shall be fired only on coal, petroleum coke, or tire derived fuel (TDF). Propane or natural gas may be used as start-up fuel. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. No more than 835,520 lbs (on a dry basis) of solid fuel per day of no more than 4.0% by weight sulfur shall be introduced into the combustor. [District NSR Rule & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 9. Of the total fuel introduced into the combustor, no more than 91,907 lbs per day (on a dry basis) shall be TDF. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. Limestone shall be capable of being directly injected into the combustor at a minimum of 0.42 lb limestone per lb of fuel introduced into the combustor. [District NSR Rule], [Federally Enforceable Through Title V]
- 11. Peak temperature of combustor shall not exceed 1800 degrees F. [District NSR Rule], [Federally Enforceable Through Title V]
- 12. Unit shall be operated as staged-combustion device by introducing sub-stoichiometric amount of combustion air in primary combustion zone. [District NSR Rule], [Federally Enforceable Through Title V]
- 13. Ash shall be removed from combustion system only by means authorized by ash handling and loadout operation (Permit No. S-883-4). [District NSR Rule], [Federally Enforceable Through Title V]
- 14. Fuel feed and combustion air supply shall be automatically shutdown whenever fabric collector is shutdown. [District NSR Rule], [Federally Enforceable Through Title V]
- 15. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity at any time from fuel conveyors, crusher, feed bin, feeder, and fabric collector. [District NSR Rule], [Federally Enforceable Through Title V]
- 16. All combustor exhaust gas shall pass through fabric collector prior to emission to atmosphere. [District NSR Rule], [Federally Enforceable Through Title V]
- 17. Ammonia injection system shall be capable of delivering at least 2.0 moles of NH3 for each mole of NOx. [District NSR Rule], [Federally Enforceable Through Title V]
- 18. Soot-blowing shall not result in visible emissions of greater than Ringelmann 1 or equivalent 20% opacity, excluding uncombined water vapor, except for aggregate periods of less than 3 minutes in any one hour period. [District Rule 4101], [Federally Enforceable Through Title V]
- 19. At least 5% of annual energy output shall be in the form of useful thermal energy which shall be used for thermally enhanced oil recovery in the Heavy Oil Central Stationary Source. [District NSR Rule], [Federally Enforceable Through Title V]

- 20. Permittee shall maintain accurate daily records of energy output and useful thermal energy output and shall annually demonstrate compliance with minimum percentage requirement for thermal energy output set forth above. [District Rule 1070, 4.0], [Federally Enforceable Through Title V]
- 21. Combustor start-up is defined as any period, not exceeding 96 hours, during which the combustor is heated from a lower temperature to the steady state operating temperature. [District Rule 4352, 3.13], [Federally Enforceable Through Title V]
- 22. Particulate matter (PM-10) emission rate shall not exceed 4.31 lb/hr, 0.0111 lb/MMBtu and 0.007 grains/dscf. [District NSR Rule], [Federally Enforceable Through Title V]
- 23. Except during periods of combustor start-up, sulfur oxide emissions (as SO2) shall not exceed 15.47 lb/hr and 0.0398 lb/MMBtu. [District NSR Rule], [Federally Enforceable Through Title V]
- 24. During periods of combustor start-up, sulfur oxide emissions (as SO2) shall not exceed 0.11 lb/MMBtu, calculated on a daily basis. [District NSR Rule], [Federally Enforceable Through Title V]
- 25. Sulfur oxide emissions (as SO2) shall not exceed the following quarterly amounts: 1st Qtr., 33,415 lbs; 2nd Qtr., 33,786 lbs; 3rd Qtr., 34,158 lbs; and 4th Qtr., 34,158 lbs. [District NSR Rule], [Federally Enforceable Through Title V]
- 26. Except during periods of combustor start-up, nitrogen oxides emissions (as NO2) shall not exceed 38.90 lb/hr and 0.1000 lb/MMBtu. [District NSR Rule], [Federally Enforceable Through Title V]
- 27. During periods of combustor start-up, nitrogen oxide emissions (as NO2) shall not exceed 0.20 lb/MM Btu, calculated on a daily basis. [District NSR Rule], [Federally Enforceable Through Title V]
- 28. Nitrogen oxide emissions (as NO2) shall not exceed the following quarterly amounts: 1st Qtr., 84,024 lbs; 2nd Qtr., 84,958 lbs; 3rd Qtr., 85,891 lbs; and 4th Qtr., 85,891 lbs. [District NSR Rule], [Federally Enforceable Through Title V]
- 29. Volatile organic compound (VOC) emission rate shall not exceed 6.03 lb/hr and 0.0155 lb/MMBtu. [District NSR Rule], [Federally Enforceable Through Title V]
- 30. Carbon monoxide (CO) emission rate shall not exceed 105.10 lb/hr (3-hour average) and 0.2701 lb/MMBtu. [District NSR Rule & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 31. Performance testing shall be conducted annually for NOx, SOx, CO, VOCs, and PM(10) at the maximum operating capacity using following test methods; for NOx EPA Methods 1-4 and 7 or ARB Method 100; for SOx EPA Methods 1-4 and 8 or ARB Method 100; for CO EPA Method 1-4 and 10 or ARB Method 100; for VOCs EPA Method 25 or 18; and for PM(10) EPA Method 201A in combination with EPA Method 202. [District Rule 4352, 6.4; District Rule 2520, 9.4.2; PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 32. The District and EPA must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1 & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 33. Performance testing shall be witnessed or authorized District personnel and EPA. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3 & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 34. Quarterly and start-up NOx and SOx emissions shall be measured by maintaining CEM, fuel use and fuel Btu content records, and such records shall be made available for District inspection upon request. [District Rule 1070, 4.0], [Federally Enforceable Through Title V]
- Permittee shall maintain an operating log containing type and quantity of fuel used and higher heating value of such fuels on daily basis. [District NSR Rule; District Rule 4352, 6.2; PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 36. All wells producing from strata steamed by this unit shall be connected to a District approved emissions control system, have District approved closed casing vents, or be District approved uncontrolled cyclic wells. [District NSR Rule], [Federally Enforceable Through Title V]
- 37. Sulfur fuel of the each type of fuel shall be measured and recorded on monthly basis using current ASTM Methods or shall be certified by supplier for each shipment. [District Rule 2520, 9.4.2 & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 38. Operator shall install, operate, and maintain in calibration a system which continuously measures and records control system operating parameters; elapsed time of operation; and exhaust gas Opacity, NOx, SO2, and O2 (or CO) concentrations. [District NSR Rule; District Rule 1080, 4.0; & PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 39. The continuous emissions monitoring system shall meet the performance specification requirements in 40 CFR 60, Appendix B; 40 CFR 60, Appendix F; and 40 CFR 51, Appendix P, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [Kern County Rule 108; District Rule 1080, 6.5; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 40. Operator shall install, operate, and maintain in calibration a system which continuously measures and records stack gas volumetric flow rates meeting the performance specifications of 40 CFR Part 52, Appendix E. [PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 41. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [Kern County Rule 108; and District Rule 1080, 7.2], [Federally Enforceable Through Title V]

- 42. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance of any CEMs that have been installed pursuant to District Rule 1080, and emission measurements. [Kern County Rule 108; District Rule 1080, 7.3; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 43. Permittee shall submit a CEMs written report for each calendar quarter to the District and to EPA. The report is due on the 30th day following the end of the calendar quarter. [Kern County Rule 108; District Rule 1080, 8.0; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 44. Quarterly report shall include: time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 2520, 9.6.1; Rule 1080, 8.0; Kern County Rule 108; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 45. Any violation of emission standards, as indicated by the CEM, shall be reported by the operator to the APCO within 96 hours. Excess emissions shall be defined as any three-hour period during which emissions of SOx or NOx as measured by CEM system exceeds the SOx and NOx maximum emission limits set forth for each the pollutants in this permit. [Kern County Rule 108; District Rule 1080, 9.0; and PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 46. Operator shall notify the District no later than eight hours after the detection of a breakdown of the CEM. The operator shall inform the District of the intent to shut down the CEM at least 24 hours prior to the event. [Kern County Rule 108; and District Rule 1080, 10.0], [Federally Enforceable Through Title V]
- 47. Permittee shall not discharge or cause the discharge into the atmosphere SO2 in excess of the more strigent of 14.0 lb/hr or 20 ppm at 3% O2 (3-hour average) from stack venting from the combustion unit. [PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 48. Permittee shall not discharge or cause the discharge into the atmosphere NOx in excess of the more stringent of 38.9 lb/hr or 78 ppm at 3% O2 (3-hour average) from stack venting from the combustion unit. [PSD ATC SJ 85-07], [Federally Enforceable Through Title V]
- 49. Fabric collection system shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 50. Fabric collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 51. Records of fabric collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-4-6 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

ASH HANDLING AND LOADOUT OPERATION INCLUDING ENCLOSED CONVEYING SYSTEM FROM COMBUSTION CHAMBER AND FABRIC COLLECTOR HOPPERS, ASH STORAGE SILO AND DRY ASH LOADOUT WITH CO-AXIAL SPOUT VENTED TO FABRIC COLLECTOR, AND ENCLOSED PUG MILL - POSO CREEK

- 1. Ash silo shall be dust-tight and shall vent only to fabric collector. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. Fabric collector shall have maximum air-to-cloth ratio of 4.5 cfm/sq. ft. filter area. [District NSR Rule], [Federally Enforceable Through Title V]
- Fabric collector shall be equipped with automatically activated reverse pulse jet cleaning mechanism. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Fabric collector shall be equipped with operational differential pressure indicator, one for each compartment. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Fabric collector shall be equipped with dust-tight provisions to return collected material to ash silo. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Ash shall be sufficiently wetted to prevent visible emissions (as defined in Rule 4101) during loadout. [District Rule 4101], [Federally Enforceable Through Title V]
- 7. Dry ash shall be loaded through co-axial telescoping spout vented to fabric collector such that visible emissions are prevented (as defined in Rule 4101). [District Rule 4101], [Federally Enforceable Through Title V]
- 8. Trucks shall be completely covered by tarps before being moved. [District NSR Rule], [Federally Enforceable Through Title V]
- 9. Ash shall not be transferred into silo or loaded into trucks unless fabric collector is operating. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. Particulate matter (PM-10) emission rate (fabric collector exhaust and fugitive emissions) shall not exceed 0.01 lb/day. [District NSR Rule], [Federally Enforceable Through Title V]
- 11. Fabric collection system shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 12. Fabric collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might intertfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 13. Visible emissions from storage silo shall be checked and record results monthly. If visible emissions are observed, corrective action is required prior to further loading. Corrective action means that visible emissions are eliminated before next loading event. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. Records of fabric collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-8-1 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

SAND RECEIVING AND STORAGE OPERATION INCLUDING ONE PNEUMATICALLY-FILLED STORAGE SILO WITH FABRIC COLLECTOR

- 1. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. Sand shall not be transferred into silo unless fabric filter baghouse is operating and functioning properly. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Collected fines shall be returned to sand system. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Sand receiving shall not exceed 48 hr/month. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Silo fabric filter baghouse particulate matter (PM-10) emission rate shall not exceed 0.141 lb/hr and 0.02 gr/scf. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Fabric collection system shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 7. Fabric collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might intertfere with PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 8. Visible emissions from storage silo shall be checked and record results annually. If visible emissions are observed, corrective action is required prior to further loading. Corrective action means that visible emissions are eliminated before next loading event. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 9. Records of fabric collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 10. The records of hours of operation of sand receiving system shall be maintained on monthly basis. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-10-1 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

25 MMBTU/HR OIL-FIRED STRUTHERS STEAM GENERATOR USL #1, INCLUDING PCC LOW NOX BURNER AND COMBUSTION AIR CONTROLS AND HEATER TECHNOLOGY SO2/PM SCRUBBER - POSO CREEK

- 1. Scrubber mist eliminator shall be properly cleaned and maintained. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be maintained with no detectable leaks. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Scrubber liquid pH shall be maintained between 6.0 and 7.5 and shall be continuously monitored. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Fuel oil preheat and atomization equipment shall be operated and maintained as intended by manufacturer. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Excess O2 shall be maintained between 0.5 and 3.0% by continuous operation oxygen analyzer/controller. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Compliance source testing for NOx, PM10, SO2 and fuel oil sulfur content shall be conducted annually (or as approved by the District) within 60 days prior to the permit anniversary. [District NSR Rule], [Federally Enforceable Through Title V]
- 7. Fuel oil sulfur content shall not exceed 1.1% by weight. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. Particulate matter emissions shall not exceed 0.1 gr/dscf (calculated to 12% Carbon Dioxide) and visible emissions from any single emission point shall be less than 20% opacity. [District Rules 4101 & 4201], [Federally Enforceable Through Title V]
- 9. Sulfur oxide (SOx) emission rate shall not exceed 2.9 lb/hr. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. Nitrogen oxide (NOx) emission rate shall not exceed 6.7 lb/hr. [District NSR Rule], [Federally Enforceable Through Title V]
- 11. The sulfur content of the fuel being fired in the unit shall be determined using ASTM method D 1072-80, D 3031-81, D 4084-82 or D 3246-81. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 12. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 13. Operator shall perform annual source testing for NOX (ppmv) according to EPA Method 7E (or ARB Method 100), stack gas oxygen by EPA Method 3 or 3A (or ARB Method 100), NOX emission rate (heat input basis) by EPA Method 19, stack gas velocities by EPA Method 2, stack gas moisture content by EPA Method 4, and for SOx & PM combined EPA Methods 5 & 8. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. Nitrogen oxide (NOx) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O2 and lb/MMBtu rates shall be calculated as lb NO2/MMBtu of heat input (hhv). [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 15. A visible inspection shall be conducted weekly if unit is fired on fuel oil. If visible inspection documents opacity, EPA method 9 evaluation shall be completed within three working days, or during next scheduled operating period if unit ceases firing on fuel oil within three working day time frame. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 16. Operator shall maintain copies of fuel invoices and supplier certifications and amount of fuel combusted. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 17. Operator shall ensure all required source testing conforms to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081, and Kern County Rule 108.1], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-11-1 **EXPIRATION DATE:** 01/31/2005

#### **EQUIPMENT DECRIPTION:**

TRUCK LOADING RACK WITH VAPOR RECOVERY INCLUDING FLARE WITH NORTH AMERICAN 4018M GAS PILOT FLAME SENSOR - POSO CREEK

- 1. Flare pilot shall be adjusted such that flame extends beyond pilot tube into main combustion chamber. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. Flare combustion air ports shall be locked in an open position supplying sufficient air to prevent smoking at all loading rates. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Only vapor control equipped, bottom loading, vapor-tight trucks shall be loaded at this facility. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. A "Notice of Operators" sign shall be posted at the loading rack stating that only only bottom loading with vapor control is permitted and that loading must be discontinued if the flare is smoking. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Loading line shall be equipped with a shut-off valve immediately upstream of the 3" N.P.T. coupling. [District NSR Rule], [Federally Enforceable Through Title V]
- 7. Loading pump shall be electrically interlocked with vapor control check valve adaptor and flare pilot sensor to prevent loading of crude oil when the vapor control line is disconnected and/or the flare is not operating. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. Propane gas shall be used as supplemental fuel and pilot fuel to the flare. [District NSR Rule], [Federally Enforceable Through Title V]
- 9. The organic liquid loading shall not exceed 4000 gallons in any one day. [District Rule 4624, 4.1], [Federally Enforceable Through Title V]
- 10. Permittee shall maintain accurate daily records of liquid throughput, loading temperature, and liquid TVP and make such records readily available for District inspection upon request. [District Rule 4624, 6.1], [Federally Enforceable Through Title V]
- 11. Visible emissions shall be checked at least monthly. If visible emissions are observed, an EPA Method 22 observation shall be made. A record containing results of observation shall be maintained including observer's name, affiliation, date, time, wind speed, wind direction, and observer's location relative to the sun. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-12-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

63,000 GALLON FIXED ROOF WASH TANK WITH VAPOR RECOVERY AND PRESSURE/VACUUM VENT - POSO CREEK

- 1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4623, 5.3.1], [Federally Enforceable Through Title V]
- 2. Tank vapors shall vent only to vapor collection system and discharge only to flare serving truck loading rack described in Permit No. S-883-11. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Pressure/vacuum vent shall be set to relieve at a pressure higher than required to activate vapor compressor. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Tank roof appurtenances shall be maintained leak free. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.2], [Federally Enforceable Through Title V]
- 6. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. "Gas-tight" shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.3], [Federally Enforceable Through Title V]
- 7. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 8. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 9. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 10. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 11. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 12. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

- 13. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. Operator shall keep a record of types of liquids stored in each container, storage temperature and the Reid vapor pressure of such liquids. [District Rule 4623, 6.1], [Federally Enforceable Through Title V]
- 15. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 degrees Fahrenheit true vapor pressure shall be determined by Reid vapor pressure at 100 degrees Fahrenheit and ARB-approved calculations. [District Rule 4623, 6.2.2], [Federally Enforceable Through Title V]
- 16. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30 degrees, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3], [Federally Enforceable Through Title V]
- 17. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District Rule 4623, 6.2.4], [Federally Enforceable Through Title V]
- 18. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4623, 6.2.5], [Federally Enforceable Through Title V]
- 19. The operator shall ensure that the vapor recovery system is functional and operating as designed at all the times. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 20. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 21. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-13-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

42,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH VAPOR RECOVERY AND PRESSURE/VACUUM VENT - POSO CREEK

- 1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4623, 5.3.1], [Federally Enforceable Through Title V]
- 2. Tank vapors shall vent only to vapor collection system and discharge only to flare serving truck loading rack described in Permit No. S-883-11. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Pressure/vacuum vent shall be set to relieve at a pressure higher than required to activate vapor compressor. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Tank roof appurtenances shall be maintained leak free. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.2], [Federally Enforceable Through Title V]
- 6. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. "Gas-tight" shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.3], [Federally Enforceable Through Title V]
- 7. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 8. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 9. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 10. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 11. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title VI
- 12. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

- 13. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. Operator shall keep a record of types of liquids stored in each container, storage temperature and the Reid vapor pressure of such liquids. [District Rule 4623, 6.1], [Federally Enforceable Through Title V]
- 15. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 degrees Fahrenheit true vapor pressure shall be determined by Reid vapor pressure at 100 degrees Fahrenheit and ARB-approved calculations. [District Rule 4623, 6.2.2], [Federally Enforceable Through Title V]
- 16. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30 degrees, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3], [Federally Enforceable Through Title V]
- 17. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District Rule 4623, 6.2.4], [Federally Enforceable Through Title V]
- 18. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4623, 6.2.5], [Federally Enforceable Through Title V]
- 19. The operator shall ensure that the vapor recovery system is functional and operating as designed at all the times. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 20. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 21. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-14-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

42,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH VAPOR RECOVERY AND PRESSURE/VACUUM VENT - POSO CREEK

- 1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4623, 5.3.1], [Federally Enforceable Through Title V]
- 2. Tank vapors shall vent only to vapor collection system and discharge only to flare serving truck loading rack described in Permit No. S-883-11. [District NSR Rule], [Federally Enforceable Through Title V]
- Pressure/vacuum vent shall be set to relieve at a pressure higher than required to activate vapor compressor. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Tank roof appurtenances shall be maintained leak free. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.2], [Federally Enforceable Through Title V]
- 6. All piping, valves and fittings shall be constructed and maintained in a gas-tight condition. "Gas-tight" shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. Emissions in excess of this limit shall be considered a leak. [District Rule 4623, 5.3.3], [Federally Enforceable Through Title V]
- 7. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 8. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 9. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 10. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 11. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title VI
- 12. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

- 13. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 14. Operator shall keep a record of types of liquids stored in each container, storage temperature and the Reid vapor pressure of such liquids. [District Rule 4623, 6.1], [Federally Enforceable Through Title V]
- 15. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 degrees Fahrenheit true vapor pressure shall be determined by Reid vapor pressure at 100 degrees Fahrenheit and ARB-approved calculations. [District Rule 4623, 6.2.2], [Federally Enforceable Through Title V]
- 16. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30 degrees, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3], [Federally Enforceable Through Title V]
- 17. Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device. [District Rule 4623, 6.2.4], [Federally Enforceable Through Title V]
- 18. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4623, 6.2.5], [Federally Enforceable Through Title V]
- 19. The operator shall ensure that the vapor recovery system is functional and operating as designed at all the times. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 20. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]
- 21. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-15-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

SIX STEAM DRIVE WELLS WITH CLOSED CASING VENTS

- 1. Sulfur compound emissions shall not exceed 2000 ppmv as SO2. [District Rule 4801, 3.0], [Federally Enforceable Through Title V]
- 2. Well casing vents shall remain closed at all times except during periods of actual service or repair while wells are not producing. [District Rule 4401, 5.0, 4.1], [Federally Enforceable Through Title V]
- 3. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1], [Federally Enforceable Through Title V]
- 4. A leak is defined as a reading in excess of 10,000 ppm when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 4401, 3.4], [Federally Enforceable Through Title V]
- 5. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1], [Federally Enforceable Through Title V]
- Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the
  necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1], [Federally Enforceable Through Title
  VI
- 7. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rules 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-25-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

195 HP DETROIT DIESEL EMERGENCY IC ENGINE DRIVING EMERGENCY FIREWATER PUMP

- 1. The engine shall be equipped with a non-resettable elapsed-time meter indicating total hours of operation. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. The engine shall be equipped with a turbocharger and with an aftercooler or intercooler. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201], [Federally Enforceable Through Title V]
- 7. Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. Operation of the engine, for other than maintenance purposes, shall be limited to emergency use. [District NSR Rule], [Federally Enforceable Through Title V]
- 9. This engine shall be operated only for required regulatory purposes and during utility power interruptions. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-26-1 **EXPIRATION DATE:** 01/31/2005

### **EQUIPMENT DECRIPTION:**

112 HP DIESEL-FIRED WAUKESHA EMERGENCY IC ENGINE DRIVING EMERGENCY FEEDWATER PUMP

- 1. The engine shall be equipped with a non-resettable elapsed-time meter indicating total hours of operation. [District NSR Rule], [Federally Enforceable Through Title V]
- 2. The engine shall be equipped with a turbocharger and with an aftercooler or intercooler. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. The engine shall be operated with the timing retarded four degrees from the manufacturer's standard recommended timing. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201], [Federally Enforceable Through Title V]
- Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District NSR Rule], [Federally Enforceable Through Title V]
- 8. Operation of the engine, for other than maintenance purposes, shall be limited to emergency use. [District NSR Rule], [Federally Enforceable Through Title V]
- 9. This engine shall be operated only for required regulatory purposes and during utility power interruptions. [District NSR Rule], [Federally Enforceable Through Title V]
- 10. The permittee shall maintain records of hours of operation and of the sulfur content of the diesel fuel used and shall make such records readily available to District staff upon request. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-29-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

20,250 GPM 1255 H.P. COOLING TOWER-RIO BRAVO POSO COGENERATION PLANT

## **PERMIT UNIT REQUIREMENTS**

1. No hexavalent chromium containing compounds shall be added to cooling tower circulating water. [District Rule 7012]

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-883-30-1 **EXPIRATION DATE:** 01/31/2005

**EQUIPMENT DECRIPTION:** 

435 BHP CUMMINS MODEL NTA-855 EMERGENCY DIESEL FIRED I.C. ENGINE DRIVING AN AIR COMPRESSOR

- 1. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance and testing purposes shall not exceed 200 hours per year. [District NSR Rule and District Rule 4701], [Federally Enforceable Through Title V]
- 2. The diesel engine shall be operated with an initial injection timing setting of 16 degrees BTDC (Before Top Dead Center) or less. [District NSR Rule], [Federally Enforceable Through Title V]
- 3. Engine shall be equipped with a turbocharger. [District NSR Rule], [Federally Enforceable Through Title V]
- 4. Engine shall be equipped with an aftercooler or intercooler. [District NSR Rule], [Federally Enforceable Through Title V]
- 5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule], [Federally Enforceable Through Title V]
- 6. Emissions shall not exceed 7.9 g NOx/bhp-hr. [District NSR Rule], [Federally Enforceable Through Title V]
- 7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201], [Federally Enforceable Through Title V]
- 8. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule], [Federally Enforceable Through Title V]
- 9. The permittee shall maintain records of hours of non-emergency operation and of the sulfur content of the diesel fuel used. Such records shall be made available for District inspection upon request for a period of two years. [District Rule 2520, 9.4.2], [Federally Enforceable Through Title V]